

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
(Alexandria Division)**

**DAVID P. DONOVAN,**

*Plaintiff,*

v.

**BETH A. WILKINSON,**

*Defendant.*

**Civil Action No. 1:20-cv-1344**

**CONSENT MOTION FOR EXTENSION OF  
DECEMBER 7, 2020 ORDER [ECF 75]**

Plaintiff David P. Donovan (“Plaintiff”), pursuant to Local Rule 7 and the Court’s December 7, 2020 Order [ECF 75] (“Order”) hereby moves for a forty-eight hour extension of the deadlines set forth in the Order. In support of this consent motion, Plaintiff states as follows:

1. On Monday, December 7, 2020, this Court issued an Order ordering (1) that no party shall submit additional filings of previously sealed materials in redacted form for public filing prior to noon on December 9, 2020, to allow third parties time to complete preparing their papers and file materials in this Court seeking the opportunity to assert privileges and other privacy and related interests; and (2) that the Clerk’s office shall not place on the public docket the redacted materials Defendant filed with the Court on Friday, December 4, 2020 in hard copy until at least noon on December 9, 2020, as further modified by any additional order of this Court.

2. Since the Court’s entry of the Order, counsel for Plaintiff, Defendant and the interested third parties who have prepared intervention papers have been in constant communication to work towards consented terms of the third parties’ desired motion for intervention. Unfortunately, despite diligent efforts, outstanding issues related to the third party’s

intervention motion were not resolved until very late into the night on December 8, 2020. Though Plaintiff understands the third party will be filing a motion to intervene seeking, among other things, an extension of the Order, to provide the Court sufficient time to consider that motion without risk that the noon deadline passes on December 9 without a further order of the Court, Plaintiff separately asks herein for a brief extension of the Order to facilitate time for a ruling on the third party intervention motion.

3. Accordingly, Plaintiff respectfully requests, with the consent and agreement of Defendant, that the Court extend its Order for another forty-eight hours, extending the deadlines set forth therein to noon on Friday December 11, 2020.

A proposed order is filed herewith.

**THE PARTIES CONSENT TO SUBMISSION OF THIS MOTION  
TO THE COURT WITHOUT A HEARING.**

Respectfully submitted, this 9<sup>th</sup> day of December, 2020,

/s/ Cathy A. Hinger  
Cathy A. Hinger (VSB No. 46293)  
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*Counsel for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 9th day of December, 2020, a true and correct copy of the foregoing motion was filed with the Clerk of Court using the CM/ECF system, which will send a notification of such filing to all counsel of record.

/s/ Cathy A. Hinger  
Cathy A. Hinger, Esq.